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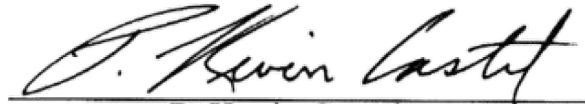
* ADMITTED IN NY & NJ

April 10, 2024

Sent via ECF

Honorable P. Kevin Castel
United States District Court Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

Bail hearing is scheduled for April 30, 2024
at 3:00 p.m. in Courtroom 11D.
SO ORDERED.
Dated: 4/11/2024


P. Kevin Castel
United States District Judge

RE: United States v. Saleh Mohammed Hauter
Case No.: 24-CR-00051-PKC

Dear Judge Castel:

As you are aware, this firm represents Mr. Saleh Mohammed Hauter with regard to the above-referenced matter. At this time I would like the opportunity to make an amended bail application, during which I will propose the following bail package which should adequately rebut this Court's previous finding that Mr. Hauter is too much of a flight risk to be released on bail.

I am proposing a \$750,000 personal recognizance bond, backed by four sureties who are all employed, as well as two properties to be used as collateral; both properties have a combined equity of \$1.4 million. Additionally, Mr. Hauter will consent to home confinement with monitoring by pretrial services. The home confinement should rebut your Honor's concerns that the defendant may be a flight risk. If Mr. Hauter is confined to his home while wearing an ankle bracelet, he will be unable to leave. Additionally, a \$750,000 bond, backed by four employed sureties who are all Mr. Hauter's family and friends, should offset any of your Honor's concerns associated with Mr. Hauter's potential flight risk (or lack thereof).

Please allow me to make the above-discussed bail application as soon as your Honor is available to hear this matter and I request that I be able to argue this matter before your Honor as you are familiar with the pertinent facts of this case. AUSA Matthew King is aware of my desire to make an amended bail application; however, she is opposed to my request herein.

Thank you for your attention herein. If you have any questions and/or concerns with regard to the above please do not hesitate to contact the undersigned.

LAZZARO LAW FIRM, P.C.

BY: 
Lance Lazzaro, Esq.

cc: AUSA Matthew King
via ECF